PATENT

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Application No.:   09/746,619

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Applicant: Woods et al

Group Art Unit: 2163

Examiner: Thai

Title: Technology Management System Using Knowledge Management Disciplines, Web-Based Technologies, and Web Infrastructures

Attorney Docket: 7784-000156

Commissioner for Patents
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Pre-Appeal Statement

In the present application claims 1, 3-17, 19, 20, 22-27 and 30-34 are pending. It is respectfully submitted that all of the claims have been improperly rejected and withdrawal of all of the rejections is requested.

OVERVIEW

The present application claims a web-based collaboration tool enabling an individual to *populate* a card catalog, thereby updating a controlled lexicon that is used with the tool. The system disclosed in the present application enables a single individual to both add information to a card catalog remotely via the web-based collaboration tool 50, as well as to access a bookshelf via a web portal 52. (see page

23, lines 5-8 of the application). Importantly, no "pre-cataloguing" of the information is required with the present system.

REJECTION OF CLAIMS 1, 13-17, 19-20, 22-27 AND 30-35 UNDER 35 U.S.C. § 103 IS IMPROPER

Claims 1, 3-17, 19-20 and 22-27 and 30-35 have been finally rejected under 35 U.S.C. § 103(a) as being unpatentable over Horovitz et al. (U.S. Pat. No. 6,389,409) in view of Wical (U.S. Pat. No. 6,487,545) and further in view of Nichols et al. (US Pub 2003/0055652 A1). It is respectfully submitted that the combination of references cited by the Office does not present a *prima facie* case of obviousness.

Claims 1 and 25 were amended to essentially recite "a notification device that provides at least one of said single collaboration group and said more than one collaboration group with notification data based on said entries."

Horovitz et al, Wical and Nichols et al fail to show, teach, or suggest, either singly or in combination, a technology management system as claimed. More particularly, these references fail to disclose or suggest a notification device that provides *at least one of said single collaboration group and said more than one collaboration group with notification data based on said entries in a card catalog.* The subject matter of claims 1 and 25 is completely absent from the cited references. Moreover, the subject matter as now claimed would not be obvious from this combination of references as there is no suggestion or motivation present form the references themselves to combine the relevant teachings from each as the Examiner has done. Accordingly, reconsideration and withdrawal of the rejection of claims 1 and 25 is respectfully requested.

Horovitz et al and Wical Each Fail To Disclose Or Suggest Important Operational Features Of The Present System

Horovitz et al, fails to disclose a card catalog that can be _populated,_ as well as _accessed,_ by various individuals or diverse group of individuals. The Examiner remarked that the induced graph disclosed in Horovitz et al, the "'LinkGraph', is equivalent to a 'card catalog'". Specifically, Horovitz et al states:

> It can be readily seen that the logical mesh of pages and links actually induces a graph data structure. _This induced graph is not created—rather, it can be thought of as a view into the online catalog structure. This induced graph will be referred to as the LinkGraph . . ." (see col. 5, lines 50-54).

Therefore, Horovitz et al does not involve using a "collaboration input" to obtain a relevant card catalog (i.e. LinkGraph) and also to populate the card catalog. Thus, Horovitz et al does not disclose or suggest an important feature of the present application, that being providing specific individuals or groups of individuals with the ability to access the card catalog, as well as the ability to populate it, to thus maintain the card catalog in an "up-to-date" state. Importantly, the card catalog of the present system and method allows the up-dating to be done according to a lexicon based in the relevant technology that the users are working with (e.g. wings, flaps, engines, etc.).

The present system does not rely on pre-existing catalogs, as required in the Horovitz et al system, but considers that the distributed source documents are uncatalogued. Thus, the present system interacts directly with a distributed network of document assets that are in no way placed in any form of prior developed, relevant navigation hierarchy. Much of the Horovitz et al reference focuses on the dynamic

creation of a unifying information graph obtained from existing, logically correct catalogs.

The present system and method does not rely on the existence of such a capability for its use and operation. Rather, it requires only the documents themselves, not any form of pre-existing classification catalog(s) for documents to be catalogued in a card catalog.

As noted above, the Wical patent involves the use of a classifier which is based on pre-existing independent static ontologies However, the present system and method makes no assumption of either the simple a priori catalogs of Horovitz et al or the more sophisticated ontologies on Wical. In fact the distributed network of content that is addressed by the Applicants' system and method does not need to be meaningfully catalogued, classified, or previously placed in relation to an ontology. While such a pre-existing cataloguing, or creation of an ontology, appears to be an important prerequisite for the operation of the Horovitz et al and Wical systems, such pre-existing cataloging or development of an ontology relating to the documents to be catalogued is simply not required with the present system.

Looking closely at the Wical patent, it will be noted that Wical initially involves the need for a given a set of terms (for example in a given document), to create a classification for the set of terms based on pre-existing catalogs of knowledge. The classifier itself is referred to as a "Knowledge Catalog Processor" and the basic function of this patent is outlined in Fig. 6 of Wical. However, the source content in Applicant's system (which would be Wical's Words/Terminology in Fig. 6.) is not placed in reference to any other catalogs on knowledge. Also, the result of the Wical "Knowledge

Processor" is a classification of the Words/Terminology in an allegedly consistent overarching catalog consisting of static and dynamic elements, the static elements of which exist a priori. The system of the present application, however, does not rely on static pre-existing ontologies, nor on the linking of such, nor on the broad and comprehensive word senses required for them, for its operation and use. The claimed system simply does not require the building of such "a priori ontologies".

Additionally, none of the above-discussed references, either singly or in combination, provides for a card catalog that can be populated with uncatalogued information input by individual stewards from the same or different collaboration groups, in accordance with a controlled lexicon of technology-specific terminology data. The references cited by the Examiner, to emphasize, all require some sort of pre-cataloguing for the documents being handled. The present system requires no such pre-cataloguing of the information before same is input into the system.

CONCLUSION

It is submitted that the rejections of all of the pending claims are improper and allowance of the application is respectfully requested.

Respectfully submitted,

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